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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

14 WILD HORSE EDUCATION, a non-profit
15 corporation; and LAURA LEIGH,
individually.

CASE NO. 3:23-cv-00372-LRH-CB

16 Plaintiffs,

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18 UNITED STATES DEPARTMENT OF
19 INTERIOR, BUREAU OF LAND
MANAGEMENT, and JON RABY, Nevada
20 State Director of the Bureau of Land
Management,

PROPOSED TEMPORARY RESTRATINING ORDER

21 Defendants.

1 1. This matter came before the Court on Plaintiffs' Second Motion for Temporary
2 Restraining Order and Preliminary Injunction, with supporting declarations on October ____,
3 2024, at ____ : ____ .m. Based on the pleadings, evidence, and oral argument, the court makes
4 the following findings and issues the following temporary restraining order.

- 5 a. For the purposes of this Order, this Court has jurisdiction over the subject matter
6 of this action and over the parties. The subject matter of this action involves
7 alleged violations of the Wild and Free-Roaming Horses and Burros Act, as
8 alleged in Plaintiffs' Motion.
- 9 b. Plaintiffs will be irreparably harmed if Defendants proceed with the gather and
10 removal of wild horses of the Triple B Complex without complying with the Wild
11 and Free-Roaming Horses and Burros Act, as alleged in Plaintiffs' Motion.
- 12 c. No interim harm will result if the Court grants Plaintiffs' request for a temporary
13 restraining order that preserves the status quo pending the outcome of a hearing
14 on Plaintiffs' request for preliminary injunction.

15 2. This temporary restraining order is issued and effective on October ____ , 2024,
16 at ____ : ____ .m.

17 IT IS THEREFORE ORDERED that Defendants, their agents, employees, and assigns
18 are enjoined and restrained from conducting any activities related to the gather and removal of
19 wild horses and burros from the Triple B Complex for a period of _____ days beginning
20 on the date of the Court's entry of this order. Defendants must cease and desist gather activities
21 immediately.

22 IT IS FURTHER ORDERED that Defendants shall appear before this court on
23 _____ , 2024 at ____ : ____ .m. in order to show cause why this temporary
24 restraining order should not be extended through the resolution of Plaintiffs' request for a
25 preliminary injunction in this case.

1 Date: _____

2 Hon. Miranda M. Du
3 CHIEF JUDGE
4 UNITED STATES DISTRICT COURT

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